



Received & Inspected GVNW CONSULTING, INC.

FEB 18 2009

FCC Mail Room

8050 SW WARM SPRINGS STREET  
SUITE 200  
P.O. BOX 2330  
TUALATIN, OR 97062  
TEL 503.612.4400  
FAX 503.612.4401  
www.gvnw.com

February 17, 2009

**By US Postal Service:**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, D.C. 20554

**By Commercial overnight delivery:**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

re: EB Docket No. 06-36

Dear Ms. Dortch:

Please find enclosed an original and five (5) copies of the CPNI Compliance Certificate and the Accompanying Statement requirements for Southern Montana Telephone Company, TRS #802563.

Please return a stamped copy in the enclosed SASE. If there are any questions, I may be reached on 503-612-4416.

Sincerely,

Dorrene Benthin  
Senior Consultant

Enclosures

**Copies to:**

Federal Communications Commission  
Enforcement Bureau  
445 - 12<sup>th</sup> Street SW  
Washington, DC 20554

Best Copy & Printing Inc.  
445 - 12<sup>th</sup> Street, Suite CY-B402  
Washington, DC 20554

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

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Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 16, 2009

Name of company covered by this certification: Southern Montana Telephone Company

Form 499 Filer ID: 802563

Name of signatory: Larry Mason

Title of signatory: Vice President and General Manager

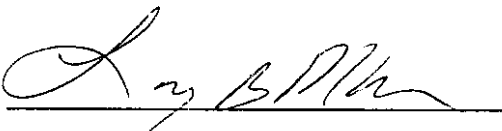
I, Larry Mason, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any action against data brokers in the past year. To the best of our knowledge, no pretexters have attempted to access CPNI at our company.

The company has not received any substantiated customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

A handwritten signature in dark ink, appearing to read 'Larry Mason', is written over a horizontal line.

Larry Mason, Vice President and General Manager

CPNI Compliance Accompanying Statement:

Year: 2008

Southern Montana Telephone Company

TRS#: 802563

This accompanying statement explains how Southern Montana Telephone Company's operating procedures ensure that the company is in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations.

Southern Montana Telephone Company adheres to all CPNI rules as stated in section 64.2001 – 64.2011 concerning the proper use of our customer's CPNI. Specifically, our notice for use of CPNI approval process meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns ;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations;
- The establishment of annual certification by a corporate officer with personal knowledge of Southern Montana Telephone Company's policies and procedures to ensure compliance with the federal CPNI rules; and
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms do not work properly to such a degree that consumers' inability to opt-out is more than an anomaly.

Southern Montana Telephone Company has on file with the FCC (as of March 1, 2008) its CPNI Manual, without the sample Forms, as further detailed explanation of how its procedures ensure that it is in compliance with the rules in Subpart U of Part 64, of Title 47 of the Code of Federal Regulations.



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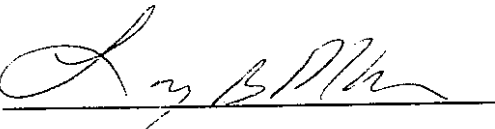
Title of signatory: Vice President and General Manager

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